

1 Scott A. Flinders (6975)
Todd W. Prall (9154)
2 HUTCHISON & STEFFEN, PLLC
Peccole Professional Park
3 10080 West Alta Drive, Suite 200
Las Vegas, Nevada 89145
4 Telephone: 702-385-2500
Facsimile: 702-385-2086
5 lrath@hutchlegal.com
tprall@hutchlegal.com

6 *Attorney for Plaintiff*

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 GATEWAY INSURANCE COMPANY, a
11 Missouri corporation,

12 Plaintiff,

13 vs.

14 ALEXANDER FERNANDEZ-LEON, an
individual; YENDRY HERNANDEZ-
15 ECHEVARRIA, an individual; GRETSIN
CONSUEGRA SORIANO, an individual;
16 JUAN SCHUEG-CASTRO, an individual;
JOSE PRIETO-HERNANDEZ, an individual;
17 NELLIS CAB LLC, OPERATION SERIES
NELLIS CAB LLC, VEH. SERIES 102, a
18 Nevada series limited liability company,

19 Defendants.

Case No.: 2:19-cv-00771-APG-BNW

**STIPULATION AND ORDER TO
AMEND COMPLAINT**

(First Request)

20 Plaintiff Gateway Insurance Company by and through its counsel of record, Scott A.
21 Flinders and Todd W. Prall of the law firm Hutchison & Steffen, PLLC, and Defendants
22 Yendry Hernandez-Echevarria, Gretsin Consuegra Soriano, Juan Schueg-Castro, and Jose
23 Prieto-Hernandez, by and through their counsel, Joseph A. Gutierrez and Stephen G. Clough of
24 Maier Gutierrez and Associates, and Nellis Cab, LLC Operation Series, by and through their
25 counsel Thomas E. Winner and Steven P. Canfield of Winner & Sherrod, hereby stipulate ,
26 hereby stipulate and agree that Plaintiff may amend its Complaint to as set forth in the proposed
27 Second Amended Complaint attached to this stipulation as Exhibit 1. The proposed Second
28 Amended Complaint does not change any of the relief sought or add parties. The purpose of

1 the proposed Second Amended Complaint is to add additional factual allegations that have been
2 discovered since the case was initiated.

3 DATED this 6th day of April, 2020.

4 HUTCHISON & STEFFEN, PLLC

5
6 /s/ Todd W. Prall

7 Scott A. Flinders (6975)
8 Todd W. Prall (9154)
9 HUTCHISON & STEFFEN, PLLC
10 Peccole Professional Park
11 10080 West Alta Drive, Suite 200
12 Las Vegas, Nevada 89145

13 *Attorney for Plaintiff*

DATED this 6th day of April, 2020.

MAIER GUTIERREZ & ASSOCIATES

/s/ Stephen G. Clough

Joseph A. Gutierrez (9046)
Stephen G. Clough (10549)
8816 Spanish Ridge Avenue
Las Vegas, Nevada 89148

*Attorneys for Defendants Yendry
Hernandez-Echeverria, Gretsin
Consuegra Soriano, Juan Schueg-Castro,
and Jose Preto-Hernandez*

11 DATED the 6th day of April, 2020

12 WINNER & SHERROD

13
14 /s/ Steven P. Canfield

15 Thomas E. Winner (5168)
16 Steven P. Canfield (12711)
17 1117 South Rancho Drive
18 Las Vegas, Nevada 89102

19 *Attorneys for Nellis Cab, LLC*

20 IT IS SO ORDERED

21 

22 United States Magistrate Judge

23 Dated: 4/8/2020